

# **ATTACHMENT 1**

## **VOLUME 3**

### **SAN ONOFRE NUCLEAR GENERATING STATION**

#### **IMPROVED TECHNICAL SPECIFICATIONS CONVERSION**

##### **ITS SECTION 3.0 LCO AND SR APPLICABILITY**

**LIST OF ATTACHMENTS**

1. **ITS Section 3.0, LCO and SR Applicability**

**Attachment 1**

**ITS Section 3.0, LCO AND SR APPLICABILITY**

**Current Technical Specification (CTS) Markup  
and Discussion of Changes (DOCs)**

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

LCO 3.0.1 LCO 3.0.1 LCOs shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2 and LCO 3.0.7.

L01

, and LCO 3.0.8

LCO 3.0.2 LCO 3.0.2 Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6.

If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required, unless otherwise stated.

LCO 3.0.3 LCO 3.0.3 When an LCO is not met and the associated ACTIONS are not met or an associated ACTION is not provided, the unit shall be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated within 1 hour to place the unit, as applicable, in:

A02

- a. MODE 3 within 7 hours;
- b. MODE 4 within 13 hours; and
- c. MODE 5 within 37 hours.

or if directed by the associated ACTIONS.

Exceptions to this Specification are stated in the individual Specifications.

Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required.

LCO 3.0.3 is applicable in MODES 1, 2, 3, and 4.

A01

only

LCO 3.0.4 LCO 3.0.4 When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall not be made except when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time. This

a.

L02

only ;  
; INSERT 1

(continued)



**INSERT 1**

- b. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate; exceptions to this Specification are stated in the individual Specifications; or
- c. When an allowance is stated in the individual value, parameter, or other Specification.

## 3.0 LCO APPLICABILITY (continued)

**LCO 3.0.4** LCO 3.0.4 Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit

A03

~~Exceptions to this Specification are stated in the individual Specifications. These exceptions allow entry into MODES or other specified conditions in the Applicability when the associated ACTIONS to be entered allow unit operation in the MODE or other specified condition in the Applicability only for a limited period of time.~~

L02

**LCO 3.0.5** LCO 3.0.5 Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.

**LCO 3.0.6** LCO 3.0.6 When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, an evaluation shall be performed ~~additional evaluations and limitations may be required~~ in accordance with Specification 5.6, "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

A01

When a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2.

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3.0 LCO APPLICABILITY (continued)

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**LCO 3.0.7** LCO 3.0.7 Special test exception (STE) LCOs in each applicable LCO section allow specified Technical Specifications (TS) LCO 3.0.7 requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with STE LCOs is optional. When an STE LCO is desired to be met but is not met, the ACTIONS of the STE LCO shall be met. When an STE LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with the other applicable Specifications.

INSERT 2 →

L01



**INSERT 2**LCO  
3.0.8

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**LCO 3.0.8**

When one or more required snubbers are unable to perform their associated support function(s), any affected supported LCO(s) are not required to be declared not met solely for this reason if risk is assessed and managed, and:

- a. the snubbers not able to perform their associated support function(s) are associated with only one train or subsystem of a multiple train or subsystem supported system or are associated with a single train or subsystem supported system and are able to perform their associated support function within 72 hours; or
- b. the snubbers not able to perform their associated support function(s) are associated with more than one train or subsystem of a multiple train or subsystem supported system and are able to perform their associated support function within 12 hours.

At the end of the specified period the required snubbers must be able to perform their associated support function(s), or the affected supported system LCO(s) shall be declared not met.

## 3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

SR 3.0.1 SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

SR 3.0.2 The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met.

For Frequencies specified as "once," the above interval extension does not apply.

If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance.

Exceptions to this Specification are stated in the individual Specifications.

SR 3.0.3 If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered. ~~The Completion Times of the Required Actions begin immediately upon expiration of the delay period.~~

A04

(continued)

3.0 SR APPLICABILITY

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SR 3.0.3 (continued) When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered. ~~The Completion Times of the Required Actions begin immediately upon failure to meet the Surveillance.~~

A04

SR 3.0.4 Entry into a MODE or other <sup>only</sup> specified condition <sup>when</sup> in the Applicability of an LCO shall ~~not~~ be made ~~unless~~ the LCO's Surveillances have been met within their specified Frequency. <sup>INSERT 3</sup> This provision shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with Actions, <sup>or that are part of a shutdown of the unit</sup>

L02

A03



**INSERT 3**

, except as provided by SR 3.0.3. When an LCO is not met due to Surveillances not having been met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with LCO 3.0.4

Insert Page 3.0-5

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

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LCO 3.0.1 LCO 3.0.1 LCOs shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2 and LCO 3.0.7.

L01

, and LCO 3.0.8

LCO 3.0.2 LCO 3.0.2 Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6.

If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required, unless otherwise stated.

LCO 3.0.3 LCO 3.0.3 When an LCO is not met and the associated ACTIONS are not met or an associated ACTION is not provided, the unit shall be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated within 1 hour to place the unit, as applicable, in:

A02

- a. MODE 3 within 7 hours;
- b. MODE 4 within 13 hours; and
- c. MODE 5 within 37 hours.

or if directed by the associated ACTIONS.

Exceptions to this Specification are stated in the individual Specifications.

Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required.

LCO 3.0.3 is applicable in MODES 1, 2, 3, and 4.

A01

only

LCO 3.0.4 LCO 3.0.4 When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall not be made except when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time. This

a.

L02

only ;  
; INSERT 1

(continued)



**INSERT 1**

- b. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate; exceptions to this Specification are stated in the individual Specifications; or
- c. When an allowance is stated in the individual value, parameter, or other Specification.

## 3.0 LCO APPLICABILITY (continued)

LCO 3.0.4	LCO 3.0.4 (continued)	Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS <span style="border: 1px solid blue; padding: 2px;">or that are part of a shutdown of the unit</span>	A03
		<del>Exceptions to this Specification are stated in the individual Specifications. These exceptions allow entry into MODES or other specified conditions in the Applicability when the associated ACTIONS to be entered allow unit operation in the MODE or other specified condition in the Applicability only for a limited period of time.</del>	L02
LCO 3.0.5	LCO 3.0.5	Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.	
LCO 3.0.6	LCO 3.0.6	<p>When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, <span style="border: 1px solid blue; padding: 2px;">an evaluation shall be performed</span> <del>additional evaluations and limitations may be required</del> in accordance with Specification 5.6, "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.</p> <p>When a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2.</p>	A01

(continued)

## 3.0 LCO APPLICABILITY (continued)

LCO 3.0.7 LCO 3.0.7 Special test exception (STE) LCOs in each applicable LCO section allow specified Technical Specifications (TS) LCO 3.0.7 requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with STE LCOs is optional. When an STE LCO is desired to be met but is not met, the ACTIONS of the STE LCO shall be met. When an STE LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with the other applicable Specifications.

INSERT 2



L01



**INSERT 2**LCO  
3.0.8

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**LCO 3.0.8**

When one or more required snubbers are unable to perform their associated support function(s), any affected supported LCO(s) are not required to be declared not met solely for this reason if risk is assessed and managed, and:

- a. the snubbers not able to perform their associated support function(s) are associated with only one train or subsystem of a multiple train or subsystem supported system or are associated with a single train or subsystem supported system and are able to perform their associated support function within 72 hours; or
- b. the snubbers not able to perform their associated support function(s) are associated with more than one train or subsystem of a multiple train or subsystem supported system and are able to perform their associated support function within 12 hours.

At the end of the specified period the required snubbers must be able to perform their associated support function(s), or the affected supported system LCO(s) shall be declared not met.

## 3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

SR 3.0.1 SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

SR 3.0.2 The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met.

For Frequencies specified as "once," the above interval extension does not apply.

If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance.

Exceptions to this Specification are stated in the individual Specifications.

SR 3.0.3 If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered. ~~The Completion Times of the Required Actions begin immediately upon expiration of the delay period.~~

A04

(continued)

3.0 SR APPLICABILITY

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SR 3.0.3      SR 3.0.3      When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered. ~~The Completion Times of the Required Actions begin immediately upon failure to meet the Surveillance.~~

A04

SR 3.0.4      SR 3.0.4      Entry into a MODE or other <sup>only</sup> specified condition <sup>when</sup> in the Applicability of an LCO shall ~~not~~ be made ~~unless~~ the LCO's Surveillances have been met within their specified <sup>INSERT 3</sup> Frequency. ~~This provision shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with Actions~~ <sup>or that are part of a shutdown of the unit</sup>

L02

A03



**INSERT 3**

, except as provided by SR 3.0.3. When an LCO is not met due to Surveillances not having been met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with LCO 3.0.4

Insert Page 3.0-5

**DISCUSSION OF CHANGES  
ITS 3.0, LCO AND SR APPLICABILITY**

ADMINISTRATIVE CHANGES

- A01 In the conversion of the San Onofre Nuclear Generating Station (SONGS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1432, Rev. 3.0, "Standard Technical Specifications-Combustion Engineering Plants" (ISTS) and additional approved Technical Specification Task Force (TSTF) travelers included in this submittal.

These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.

- A02 CTS LCO 3.0.3 provides requirements, when an LCO is not met and the associated ACTIONS are not met or the associated ACTION is not provided, for the unit to be placed in a MODE or other condition in which the LCO is not applicable, and also provides time frames to complete this requirement. ITS 3.0.3 includes an additional provision, "or if directed by the associated Actions," to the provisions when an LCO is not met and the associated Actions are not met or the associated Action is not provided for placing the unit in a MODE or other condition in which the LCO is not applicable. This changes the CTS by adding the statement that LCO 3.0.3 is to be used if directed by the associated ACTIONS.

This is a clarification to the CTS which adds additional clarifying detail to encompass all the provisions which would require the unit to be placed in a condition which the LCO is not applicable. Clarification changes to the TS constitute an administrative change.

- A03 CTS LCO 3.0.4 states that this Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. CTS SR 3.0.4 states that this Specification shall not prevent entry in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. ITS LCO 3.0.4 adds an additional allowance, that the Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are part of a shutdown of the unit. Additionally, ITS SR 3.0.4 adds an additional allowance, that the Specification shall not prevent entry in MODES or other specified conditions in the Applicability that are part of a shutdown of the unit. The proposed change to the CTS will add an allowance to not apply LCO 3.0.4 or SR 3.0.4 during a shutdown.

This requirement is a clarification to ensure there is no confusion that LCO 3.0.4 cannot prevent a shutdown. Clarification changes to the TS constitute an administrative change.

- A04 CTS SR 3.0.3 states, in part, that when the Surveillance is not performed with the delay period, the "Completion Times of the Required Actions begin immediately upon expiration of the delay period." Additionally, CTS SR 3.0.3 states, in part, that when the Surveillance is performed within the delay period and the Surveillance is not met, the "Completion Times of the Required Actions begin immediately upon failure to meet the Surveillance." ITS LCO 3.0.3 does not

**DISCUSSION OF CHANGES  
ITS 3.0, LCO AND SR APPLICABILITY**

contain these specific statements. This changes the CTS by deleting statements that the Completion Times of the Required Actions begin immediately upon either expiration of the delay period or upon failure to meet the Surveillance.

When the Surveillance is not performed within the delay time, or the Surveillance is performed within the delay time but fails, CTS LCO 3.0.3 states that the LCO must be declared not met and the appropriate Condition must be entered. As stated in LCO 3.0.2, when an LCO is not met, the Required Actions of the applicable Conditions must be met. Furthermore, ITS 1.3 adequately describes how Completion Times are to be met. Therefore, the CTS statement is not needed since it does not add any additional information. This change is designated as administrative because it does not represent a technical change to the Technical Specifications.

MORE RESTRICTIVE CHANGES

None

RELOCATED SPECIFICATIONS

None

REMOVED DETAIL CHANGES

None

LESS RESTRICTIVE CHANGES

L01 CTS Section 3.0 does not contain an allowance when snubbers cannot perform their support function. ITS Section 3.0 contains this allowance as LCO 3.0.8. This proposed change to CTS 3.0, "LCO Applicability" adds a new LCO 3.0.8 consistent with TSTF-372. Due to this addition, an allowance is also needed in LCO 3.0.1 and has been added.

The relocation of snubbers to a licensee controlled document has resulted in non-uniform and inconsistent treatment of snubbers. The proposed LCO 3.0.8 corrects the unintended consequence that resulted from the relocation of the snubbers and restores the level of plant safety afforded by the snubbers prior to their relocation. Some potential undesirable consequences of this inconsistent treatment of snubbers are:

- Performance of testing during crowded windows when the supported system is inoperable with the potential to reduce the snubber testing to a minimum since the relocated snubber requirements are controlled by the licensee;

**DISCUSSION OF CHANGES  
ITS 3.0, LCO AND SR APPLICABILITY**

- Performance of testing during crowded windows when the supported system is inoperable with the potential to increase the unavailability of safety systems; and
- Performance of testing and maintenance on snubbers affecting multiple trains of the same supported system during the 7 hours allotted before entering MODE 3 under LCO 3.0.3.

To remove the inconsistency in the treatment of snubbers, a delay time is provided before entering the actions for the supported equipment when one or more snubbers are found inoperable or removed for testing. Such a delay time will provide needed flexibility in the performance of maintenance and testing during power operation and at the same time will enhance overall plant safety by (1) avoiding unnecessary unscheduled plant shutdowns, thus, minimizing plant transition and realignment risks; (2) avoiding reduced snubber testing, thus increasing the availability of snubbers to perform their supporting function; (3) performing most of the required testing and maintenance during the delay time when the supported system is available to mitigate most challenges, thus, avoiding increases in safety system unavailability; and (4) providing explicit risk-informed guidance in areas in which that guidance currently does not exist, such as the treatment of snubbers impacting more than one redundant train of a supported system.

Southern California Edison (SCE) has verified that it is encompassed by the risk informed evaluation performed in the NRC Safety Evaluation for TSTF-372. Consistent with the staff's approval and inherent in the implementation of TSTF-372, SCE will operate in accordance with the following stipulations:

1. Appropriate plant procedures and administrative controls will be used to implement the following Tier 2 Restrictions.
  - (a) At least one AFW train (including a minimum set of supporting equipment required for its successful operation) not associated with the inoperable snubber(s), or some alternative means of core cooling (e.g., feed and bleed (F&B), fire water system or "aggressive secondary cooldown" using the steam generators) must be available when LCO 3.0.8b is used.
  - (b) LCO 3.0.8b cannot be used with no F&B capability when a snubber, whose non-functionality would disable more than one train of AFW in a seismic event of magnitude up to the plant's SSE, is inoperable.
  - (c) Every time the provisions of LCO 3.0.8 are used licensees will be required to confirm that at least one train (or subsystem) of systems supported by the inoperable snubbers would remain capable of performing their required safety or support functions for postulated design loads other than seismic loads. LCO 3.0.8 does not apply to non-seismic snubbers. In addition, a record of the design function of the inoperable snubber (i.e., seismic vs. non-seismic), implementation of any applicable Tier 2 restrictions, and the

**DISCUSSION OF CHANGES  
ITS 3.0, LCO AND SR APPLICABILITY**

associated plant configuration shall be available on a recoverable basis for staff inspection.

2. Should SCE implement the provisions of LCO 3.0.8 for snubbers, which include delay times to enter the actions for the supported equipment when one or more snubbers are out of service for maintenance or testing, it must be done in accordance with an overall configuration risk management program (CRMP) to ensure that potentially risk-significant configurations resulting from maintenance and other operational activities are identified and avoided, as discussed in the proposed TS Bases. This objective is met by SONGS Units 2 and 3 programs to comply with the requirements of paragraph (a)(4) of the Maintenance Rule, 10 CFR 50.65, to assess and manage risk resulting from maintenance activities or when this process is invoked by LCO 3.0.8 or other TS. These programs will support licensee decision making regarding the appropriate actions to manage risk whenever a risk-informed TS is entered. Since the 10 CFR 50.65(a)(4) guidance, the revised (May 2000) Section 11 of NUMARC 93-01, does not currently address seismic risk, when adopting this change SCE will ensure that the proposed LCO 3.0.8 is considered in conjunction with other plant maintenance activities and integrated into the existing 10 CFR 50.65(a)(4) process. In the absence of a detailed seismic PRA, a bounding risk assessment, as utilized in the NRC Safety Evaluation, will be followed.

L02 CTS LCO 3.0.4 states:

"When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall not be made except when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time."

Also included in CTS LCO 3.0.4 is the following discussion of exceptions to this specification:

"Exceptions to this Specification are stated in the individual Specifications. These exceptions allow entry into MODES or other specific conditions in the Applicability when the associated ACTIONS to be entered allow unit operation in the MODE or other specified condition in the Applicability only for a limited period of time."

The allowance to enter MODES or specified conditions in the Applicability while relying on ACTIONS is given because ACTIONS which permit continued operation of the unit for an unlimited period provide an acceptable level of safety for continued operation. This is without regard to the status of the unit before or after the MODE change.

CTS SR 3.0.4 allows entry into MODES and other conditions only when the SRs have been met except when required to comply with Actions.

ITS LCO 3.0.4 states:



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"When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall only be made (a) When the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time; (b) After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate; exceptions to this Specification are stated in the individual Specifications, or (c) When an allowance is stated in the individual value, parameter, or other Specification."

The CTS does not include the exceptions to the specification as is in the ITS. The proposed change revises LCO 3.0.4 and SR 3.0.4.

ITS SR 3.0.4 is consistent with the CTS SR 3.0.4; however, the following exception is being added, "...except as provided by SR 3.0.3. When an LCO is not met due to Surveillances not having been met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with LCO 3.0.4"

This changes the CTS by providing allowances for entry into a MODE or other specified condition in the Applicability when an LCO is not met.

The purpose of LCO 3.0.4 is to provide guidance when an LCO is not met and entry into a MODE or other specified condition in the Applicability is desired. SCE has reviewed the safety evaluation dated March 28, 2003, which was published in the Federal Register to support this change through the Consolidated Line Item Improvement Process. This review included a review of the NRC staff's evaluation, as well as the supporting information provided to support TSTF-359, rev. 8. SCE has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to SCE and justify the incorporation of this change into the San Onofre Units 2 and 3 Technical Specifications. Therefore, the change is considered acceptable.

In addition, the proposed Bases for LCO 3.0.4 and SR 3.0.4 are consistent with that provided in the TSTF, except for minor editorial changes that do not change the intent of the TSTF Bases. The proposed Bases provide details on how to implement the new requirement. Specifically, LCO 3.0.4 establishes limitations on changes in MODES or other specified conditions in the Applicability when an LCO is not met. It allows placing the unit in a MODE or other specified condition stated in that Applicability (e.g., the Applicability desired to be entered) when unit conditions are such that the requirements of the LCO would not be met, in accordance with LCO 3.0.4.a, LCO 3.0.4.b, or LCO 3.0.4.c.

LCO 3.0.4.a allows entry into a MODE or other specified condition in the Applicability with the LCO not met when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time. Compliance with Required Actions that permit continued operation of the unit for an unlimited period of time in a

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MODE or other specified condition provides an acceptable level of safety for continued operation. This is without regard to the status of the unit before or after the MODE change.

LCO 3.0.4.b allows entry into a MODE or other specified condition in the Applicability with the LCO not met after performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate. The risk assessment may use quantitative, qualitative, or blended approaches, and the risk assessment will be conducted using the plant program, procedures, and criteria in place to implement 10 CFR 50.65(a)(4), which requires that risk impacts of maintenance activities to be assessed and managed. The risk assessment, for the purposes of LCO 3.0.4.b, must take into account all inoperable Technical Specification equipment regardless of whether the equipment is included in the normal 10 CFR 50.65(a)(4) risk assessment scope.

The risk assessments will be conducted using the procedures and guidance endorsed by Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." Regulatory Guide 1.182 endorses the guidance in Section 11 of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." These documents address general guidance for conduct of the risk assessment, quantitative and qualitative guidelines for establishing risk management actions, and example risk management actions. These include actions to plan and conduct other activities in a manner that controls overall risk, increased risk awareness by shift and management personnel, actions to reduce the duration of the condition, actions to minimize the magnitude of risk increases (establishment of backup success paths or compensatory measures), and determination that the proposed MODE change is acceptable. Consideration should also be given to the probability of completing restoration such that the requirements of the LCO would be met prior to the expiration of ACTIONS Completion Times that would require exiting the Applicability.

LCO 3.0.4.b may be used with single, or multiple systems and components unavailable. NUMARC 93-01 provides guidance relative to consideration of simultaneous unavailability of multiple systems and components. The results of the risk assessment shall be considered in determining the acceptability of entering the MODE or other specified condition in the Applicability, and any corresponding risk management actions. The LCO 3.0.4.b risk assessments do not have to be documented. The Technical Specifications allow continued operation with equipment unavailable in MODE 1 for the duration of the Completion Time. Since this is allowable, and since in general the risk impact in that particular MODE bounds the risk of transitioning into and through the applicable MODES or other specified conditions in the Applicability of the LCO, the use of the LCO 3.0.4.b allowance should be generally acceptable, as long as the risk is assessed and managed as stated above.

There is a small subset of systems and components that have been determined to be more important to risk and use of the LCO 3.0.4.b allowance is prohibited.

**DISCUSSION OF CHANGES**  
**ITS 3.0, LCO AND SR APPLICABILITY**

The LCOs governing these systems and components contain Notes prohibiting the use of LCO 3.0.4.b by stating that LCO 3.0.4.b is not applicable. LCO 3.0.4.c allows entry into a MODE or other specified condition in the Applicability with the LCO not met based on a Note in the Specification which states LCO 3.0.4.c is applicable. These specific allowances permit entry into MODES or other specified conditions in the Applicability when the associated ACTIONS to be entered do not provide for continued operation for an unlimited period of time and a risk assessment has not been performed. This allowance may apply to all the ACTIONS or to a specific Required Action of a Specification.

The risk assessments performed to justify the use of LCO 3.0.4.b usually only consider systems and components. For this reason, LCO 3.0.4.c is typically applied to Specifications that describe values and parameters. The provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. In addition, the provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown. In this context, a unit shutdown is defined as a change in MODE or other specified condition in the Applicability associated with transitioning from MODE 1 to MODE 2, MODE 2 to MODE 3, and MODE 3 to MODE 4. Upon entry into a MODE or other specified condition in the Applicability with the LCO not met, LCO 3.0.1 and LCO 3.0.2 require entry into the applicable Conditions and Required Actions until the Condition is resolved, until the LCO is met, or until the unit is not within the Applicability of the Technical Specifications. Surveillances do not have to be performed on the associated inoperable equipment (or on variables outside the specified limits), as permitted by SR 3.0.1.

Therefore, utilizing LCO 3.0.4 is not a violation of SR 3.0.1 or SR 3.0.4 for Surveillances that have not been performed on inoperable equipment. However, SRs must be met to ensure OPERABILITY prior to declaring the associated equipment OPERABLE (or variable within limits) and restoring compliance with the affected LCO. This change is designated as less restrictive because entry into MODES or other specified conditions in the Applicability of a Specification might be made with an LCO not met as long as the plant is in compliance with LCO 3.0.4.

**Improved Standard Technical Specifications (ISTS) Markup  
and Justification for Deviations (JFDs)**

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

LCO 3.0.1 LCO 3.0.1 LCOs shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2, LCO 3.0.7, and LCO 3.0.8.

LCO 3.0.2 LCO 3.0.2 Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6.

If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required, unless otherwise stated.

LCO 3.0.3 LCO 3.0.3 When an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS, the unit shall be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated within 1 hour to place the unit, as applicable, in:

- a. MODE 3 within 7 hours;
- b. MODE 4 within 13 hours and
- c. MODE 5 within 37 hours.

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Exceptions to this Specification are stated in the individual Specifications.

Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required.

LCO 3.0.3 is only applicable in MODES 1, 2, 3, and 4.

LCO 3.0.4 LCO 3.0.4 When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall only be made:

- a. When the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time;
- b. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate; exceptions to this Specification are stated in the individual Specifications; or
- c. When an allowance is stated in the individual value, parameter, or other Specification.

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## 3.0 LCO Applicability

## LCO 3.0.4 LCO 3.0.4 (continued)

This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

## LCO 3.0.5 LCO 3.0.5

Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.

## LCO 3.0.6 LCO 3.0.6

When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, an evaluation shall be performed in accordance with Specification [5.5.15](#) "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered. 5.6 4

When a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2.

## LCO 3.0.7 LCO 3.0.7

Special test exception (STE) LCOs | in each applicable LCO section | allow specified Technical Specifications (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with STE LCOs is optional. When an STE LCO is desired to be met but is not met, the ACTIONS of the STE LCO shall be met. When an STE LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with the other applicable Specifications. 3

## DOC L01 LCO 3.0.8

When one or more required snubbers are unable to perform their associated support function(s), any affected supported LCO(s) are not required to be declared not met solely for this reason if risk is assessed and managed, and:

## 3.0 LCO Applicability

## DOC L01 LCO 3.0.8 (continued)

- a. the snubbers not able to perform their associated support function(s) are associated with only one train or subsystem of a multiple train or subsystem supported system or are associated with a single train or subsystem supported system and are able to perform their associated support function within 72 hours; or
- b. the snubbers not able to perform their associated support function(s) are associated with more than one train or subsystem of a multiple train or subsystem supported system and are able to perform their associated support function within 12 hours.

At the end of the specified period the required snubbers must be able to perform their associated support function(s), or the affected supported system LCO(s) shall be declared not met.

## 3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

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- SR 3.0.1 SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.
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- SR 3.0.2 The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met.
- For Frequencies specified as "once," the above interval extension does not apply.
- If a Completion Time requires periodic performance on a "once per" basis, the above Frequency extension applies to each performance after the initial performance.
- Exceptions to this Specification are stated in the individual Specifications.
- 
- SR 3.0.3 If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.
- If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.
- When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.



3.0 SR Applicability

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SR 3.0.4 SR 3.0.4

Entry into a MODE or other specified condition in the Applicability of an LCO shall only be made when the LCO's Surveillances have been met within their specified Frequency, except as provided by SR 3.0.3. When an LCO is not met due to Surveillances not having been met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with LCO 3.0.4.

This provision shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

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**JUSTIFICATION FOR DEVIATIONS  
ITS 3.0, LCO AND SR APPLICABILITY**

1. Changes are made (additions, deletions, and/or changes) to the ISTS which reflect the plant specific nomenclature, number, reference, system description, analysis, or licensing basis description.
2. These changes are made to the ISTS which reflect grammatical changes or any changes in conjunction with the Writers Guide for the Improved Standard Technical Specifications, TSTF-GG-05-01.
3. The ISTS contains bracketed information and/or values that are generic to all Combustion Engineering vintage plants. The brackets are removed and the proper plant specific information/value is provided. This is acceptable since the information/value is changed to reflect the current licensing basis.
4. The Specification number has been changed to be consistent with changes made to the applicable Specifications in other Sections.

**Improved Standard Technical Specifications (ISTS) Bases  
Markup and Bases Justification for Deviations (JFDs)**

## B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

## BASES

LCOs	LCO 3.0.1 through LCO 3.0.8 establish the general requirements applicable to all Specifications and apply at all times unless otherwise stated.
LCO 3.0.1	LCO 3.0.1 establishes the Applicability statement within each individual Specification as the requirement for when the LCO is required to be met (i.e., when the unit is in the MODES or other specified conditions of the Applicability statement of each Specification).
LCO 3.0.2	<p>LCO 3.0.2 establishes that upon discovery of a failure to meet an LCO, the associated ACTIONS shall be met. The Completion Time of each Required Action for an ACTIONS Condition is applicable from the point in time that an ACTIONS Condition is entered. The Required Actions establish those remedial measures that must be taken within specified Completion Times when the requirements of an LCO are not met. This Specification establishes that:</p> <ol style="list-style-type: none"> <li>Completion of the Required Actions within the specified Completion Times constitutes compliance with a Specification and</li> <li>Completion of the Required Actions is not required when an LCO is met within the specified Completion Time, unless otherwise specified.</li> </ol> <p>There are two basic types of Required Actions. The first type of Required Action specifies a time limit in which the LCO must be met. This time limit is the Completion Time to restore an inoperable system or component to OPERABLE status or to restore variables to within specified limits. If this type of Required Action is not completed within the specified Completion Time, a shutdown may be required to place the unit in a MODE or condition in which the Specification is not applicable. (Whether stated as a Required Action or not, correction of the entered Condition is an action that may always be considered upon entering ACTIONS.) The second type of Required Action specifies the remedial measures that permit continued operation of the unit that is not further restricted by the Completion Time. In this case, compliance with the Required Actions provides an acceptable level of safety for continued operation.</p> <p>Completing the Required Actions is not required when an LCO is met or is no longer applicable, unless otherwise stated in the individual Specifications.</p>

## BASES

## LCO 3.0.2 (continued)

The nature of some Required Actions of some Conditions necessitates that, once the Condition is entered, the Required Actions must be completed even though the associated Conditions no longer exist. The individual LCO's ACTIONS specify the Required Actions where this is the case. An example of this is in LCO 3.4.3, "RCS Pressure and Temperature (P/T) Limits."

The Completion Times of the Required Actions are also applicable when a system or component is removed from service intentionally. The reasons for intentionally relying on the ACTIONS include, but are not limited to, performance of Surveillances, preventive maintenance, corrective maintenance, or investigation of operational problems. Entering ACTIONS for these reasons must be done in a manner that does not compromise safety. Intentional entry into ACTIONS should not be made for operational convenience. Additionally, if intentional entry into ACTIONS would result in redundant equipment being inoperable, alternatives should be used instead. Doing so limits the time both subsystems/trains of a safety function are inoperable and limits the time conditions exist which may result in LCO 3.0.3 being entered. Individual Specifications may specify a time limit for performing an SR when equipment is removed from service or bypassed for testing. In this case, the Completion Times of the Required Actions are applicable when this time limit expires, if the equipment remains removed from service or bypassed.

When a change in MODE or other specified condition is required to comply with Required Actions, the unit may enter a MODE or other specified condition in which another Specification becomes applicable. In this case, the Completion Times of the associated Required Actions would apply from the point in time that the new Specification becomes applicable and the ACTIONS Condition(s) are entered.

## LCO 3.0.3

LCO 3.0.3 establishes the actions that must be implemented when an LCO is not met and either:

- a. An associated Required Action and Completion Time is not met and no other Condition applies, or
- b. The condition of the unit is not specifically addressed by the associated ACTIONS. This means that no combination of Conditions stated in the ACTIONS can be made that exactly corresponds to the actual condition of the unit. Sometimes, possible combinations of Conditions are such that entering LCO 3.0.3 is warranted; in such cases, the ACTIONS specifically state a Condition corresponding to such combinations and also that LCO 3.0.3 be entered immediately.

## BASES

## LCO 3.0.3 (continued)

This Specification delineates the time limits for placing the unit in a safe MODE or other specified condition when operation cannot be maintained within the limits for safe operation as defined by the LCO and its ACTIONS. It is not intended to be used as an operational convenience that permits routine voluntary removal of redundant systems or components from service in lieu of other alternatives that would not result in redundant systems or components being inoperable.

Upon entering LCO 3.0.3, 1 hour is allowed to prepare for an orderly shutdown before initiating a change in unit operation. This includes time to permit the operator to coordinate the reduction in electrical generation with the load dispatcher to ensure the stability and availability of the electrical grid. The time limits specified to reach lower MODES of operation permit the shutdown to proceed in a controlled and orderly manner that is well within the specified maximum cooldown rate and within the capabilities of the unit, assuming that only the minimum required equipment is OPERABLE. This reduces thermal stresses on components of the Reactor Coolant System and the potential for a plant upset that could challenge safety systems under conditions to which this Specification applies. The use and interpretation of specified times to complete the actions of LCO 3.0.3 are consistent with the discussion of Section 1.3, Completion Times.

A unit shutdown required in accordance with LCO 3.0.3 may be terminated and LCO 3.0.3 exited if any of the following occurs:

- a. The LCO is now met. ②
- b. A Condition exists for which the Required Actions have now been performed. ②
- c. ACTIONS exist that do not have expired Completion Times. These Completion Times are applicable from the point in time that the Condition is initially entered and not from the time LCO 3.0.3 is exited.

The time limits of LCO 3.0.3 allow 37 hours for the unit to be in MODE 5 when a shutdown is required during MODE 1 operation. If the unit is in a lower MODE of operation when a shutdown is required, the time limit for reaching the next lower MODE applies. If a lower MODE is reached in less time than allowed, however, the total allowable time to reach

## BASES

## LCO 3.0.3 (continued)

MODE 5, or other applicable MODE, is not reduced. For example, if MODE 3 is reached in 2 hours, then the time allowed for reaching MODE 4 is the next 11 hours, because the total time for reaching MODE 4 is not reduced from the allowable limit of 13 hours. Therefore, if remedial measures are completed that would permit a return to MODE 1, a penalty is not incurred by having to reach a lower MODE of operation in less than the total time allowed.

In MODES 1, 2, 3, and 4, LCO 3.0.3 provides actions for Conditions not covered in other Specifications. The requirements of LCO 3.0.3 do not apply in MODES 5 and 6 because the unit is already in the most restrictive Condition required by LCO 3.0.3. The requirements of LCO 3.0.3 do not apply in other specified conditions of the Applicability (unless in MODE 1, 2, 3, or 4) because the ACTIONS of individual Specifications sufficiently define the remedial measures to be taken.

Exceptions to LCO 3.0.3 are provided in instances where requiring a unit shutdown, in accordance with LCO 3.0.3, would not provide appropriate remedial measures for the associated condition of the unit. An example of this is in LCO 3.7.16, "Fuel Storage Pool Water Level." LCO 3.7.16 has an Applicability of "During movement of irradiated fuel assemblies in the fuel storage pool." Therefore, this LCO can be applicable in any or all MODES. If the LCO and the Required Actions of LCO 3.7.16 are not met while in MODE 1, 2, or 3, there is no safety benefit to be gained by placing the unit in a shutdown condition. The Required Action of LCO 3.7.16 of "Suspend movement of irradiated fuel assemblies in fuel storage pool" is the appropriate Required Action to complete in lieu of the actions of LCO 3.0.3. These exceptions are addressed in the individual Specifications.

[ The requirement to be in MODE 4 in 13 hours is plant specific and depends on the ability to cool the pressurizer and degas. ]

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## LCO 3.0.4

LCO 3.0.4 establishes limitations on changes in MODES or other specified conditions in the Applicability when an LCO is not met. It allows placing the unit in a MODE or other specified condition stated in that Applicability (e.g., the Applicability desired to be entered) when unit conditions are such that the requirements of the LCO would not be met, in accordance with LCO 3.0.4.a, LCO 3.0.4.b, or LCO 3.0.4.c.

## BASES

## LCO 3.0.4 (continued)

LCO 3.0.4.a allows entry into a MODE or other specified condition in the Applicability with the LCO not met when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time. Compliance with Required Actions that permit continued operation of the unit for an unlimited period of time in a MODE or other specified condition provides an acceptable level of safety for continued operation. This is without regard to the status of the unit before or after the MODE change. Therefore, in such cases, entry into a MODE or other specified condition in the Applicability may be made in accordance with the provisions of the Required Actions.

LCO 3.0.4.b allows entry into a MODE or other specified condition in the Applicability with the LCO not met after performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate.

The risk assessment may use quantitative, qualitative, or blended approaches, and the risk assessment will be conducted using the plant program, procedures, and criteria in place to implement 10 CFR 50.65(a)(4), which requires that risk impacts of maintenance activities to be assessed and managed. The risk assessment, for the purposes of LCO 3.0.4.b, must take into account all inoperable Technical Specification equipment regardless of whether the equipment is included in the normal 10 CFR 50.65(a)(4) risk assessment scope. The risk assessments will be conducted using the procedures and guidance endorsed by Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." Regulatory Guide 1.182 endorses the guidance in Section 11 of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." These documents address general guidance for conduct of the risk assessment, quantitative and qualitative guidelines for establishing risk management actions, and example risk management actions. These include actions to plan and conduct other activities in a manner that controls overall risk, increased risk awareness by shift and management personnel, actions to reduce the duration of the condition, actions to minimize the magnitude of risk increases (establishment of backup success paths or compensatory measures), and determination that the proposed MODE change is acceptable. Consideration should also be given to the probability of completing restoration such that the requirements of the LCO would be met prior to the expiration of ACTIONS Completion Times that would require exiting the Applicability.

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## BASES

## LCO 3.0.4 (continued)

LCO 3.0.4.b may be used with single or multiple systems and components unavailable. NUMARC 93-01 provides guidance relative to consideration of simultaneous unavailability of multiple systems and components.

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The results of the risk assessment shall be considered in determining the acceptability of entering the MODE or other specified condition in the Applicability, and any corresponding risk management actions. The LCO 3.0.4.b risk assessments do not have to be documented.

The Technical Specifications allow continued operation with equipment unavailable in MODE 1 for the duration of the Completion Time. Since this is allowable, and since in general the risk impact in that particular MODE bounds the risk of transitioning into and through the applicable MODES or other specified conditions in the Applicability of the LCO, the use of the LCO 3.0.4.b allowance should be generally acceptable, as long as the risk is assessed and managed as stated above. However, there is a small subset of systems and components that have been determined to be more important to risk and use of the LCO 3.0.4.b allowance is prohibited. The LCOs governing these systems and components contain Notes prohibiting the use of LCO 3.0.4.b by stating that LCO 3.0.4.b is not applicable.

LCO 3.0.4.c allows entry into a MODE or other specified condition in the Applicability with the LCO not met based on a Note in the Specification which states LCO 3.0.4.c is applicable. These specific allowances permit entry into MODES or other specified conditions in the Applicability when the associated ACTIONS to be entered do not provide for continued operation for an unlimited period of time and a risk assessment has not been performed. This allowance may apply to all the ACTIONS or to a specific Required Action of a Specification. The risk assessments performed to justify the use of LCO 3.0.4.b usually only consider systems and components. For this reason, LCO 3.0.4.c is typically applied to Specifications which describe values and parameters (e.g., [Containment Air Temperature, Containment Pressure, MCPR, Moderator Temperature Coefficient]), and may be applied to other Specifications based on NRC plant specific approval.

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and

The provisions of this Specification should not be interpreted as endorsing the failure to exercise the good practice of restoring systems or components to OPERABLE status before entering an associated MODE or other specified condition in the Applicability.

## BASES

## LCO 3.0.4 (continued)

The provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. In addition, the provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown. In this context, a unit shutdown is defined as a change in MODE or other specified condition in the Applicability associated with transitioning from MODE 1 to MODE 2, MODE 2 to MODE 3, MODE 3 to MODE 4, and MODE 4 to MODE 5.

Upon entry into a MODE or other specified condition in the Applicability with the LCO not met, LCO 3.0.1 and LCO 3.0.2 require entry into the applicable Conditions and Required Actions until the Condition is resolved, until the LCO is met, or until the unit is not within the Applicability of the Technical Specification.

Surveillances do not have to be performed on the associated inoperable equipment (or on variables outside the specified limits), as permitted by SR 3.0.1. Therefore, utilizing LCO 3.0.4 is not a violation of SR 3.0.1 or SR 3.0.4 for any Surveillances that have not been performed on inoperable equipment. However, SRs must be met to ensure OPERABILITY prior to declaring the associated equipment OPERABLE (or variable within limits) and restoring compliance with the affected LCO.

## LCO 3.0.5

LCO 3.0.5 establishes the allowance for restoring equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with ACTIONS. The sole purpose of this Specification is to provide an exception to LCO 3.0.2 (e.g., to not comply with the applicable Required Action(s)) to allow the performance of required testing to demonstrate either:

- a. The OPERABILITY of the equipment being returned to service, or
- b. The OPERABILITY of other equipment.

The administrative controls ensure the time the equipment is returned to service in conflict with the requirements of the ACTIONS is limited to the time absolutely necessary to perform the required testing to demonstrate OPERABILITY. This Specification does not provide time to perform any other preventive or corrective maintenance.

## BASES

## LCO 3.0.5 (continued)

An example of demonstrating the OPERABILITY of the equipment being returned to service is reopening a containment isolation valve that has been closed to comply with Required Actions and must be reopened to perform the required testing.

An example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to prevent the trip function from occurring during the performance of required testing on another channel in the other trip system. A similar example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to permit the logic to function and indicate the appropriate response during the performance of required testing on another channel in the same trip system.

## LCO 3.0.6

LCO 3.0.6 establishes an exception to LCO 3.0.2 for supported systems that have a support system LCO specified in the Technical Specifications (TS). This exception is provided because LCO 3.0.2 would require that the Conditions and Required Actions of the associated inoperable supported system LCO be entered solely due to the inoperability of the support system. This exception is justified because the actions that are required to ensure the unit is maintained in a safe condition are specified in the support system LCO's Required Actions. These Required Actions may include entering the supported system's Conditions and Required Actions or may specify other Required Actions.

When a support system is inoperable and there is an LCO specified for it in the TS, the supported system(s) are required to be declared inoperable if determined to be inoperable as a result of the support system inoperability. However, it is not necessary to enter into the supported systems' Conditions and Required Actions unless directed to do so by the support system's Required Actions. The potential confusion and inconsistency of requirements related to the entry into multiple support and supported systems' LCOs' Conditions and Required Actions are eliminated by providing all the actions that are necessary to ensure the unit is maintained in a safe condition in the support system's Required Actions.

However, there are instances where a support system's Required Action may either direct a supported system to be declared inoperable or direct entry into Conditions and Required Actions for the supported system. This may occur immediately or after some specified delay to perform

## BASES

## LCO 3.0.6 (continued)

some other Required Action. Regardless of whether it is immediate or after some delay, when a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2.

Specification <sup>5.6</sup> 5.5.15 "Safety Function Determination Program (SFDP)," ensures loss of safety function is detected and appropriate actions are taken. Upon entry into LCO 3.0.6, an evaluation shall be made to determine if loss of safety function exists. Additionally, other limitations, remedial actions, or compensatory actions may be identified as a result of the support system inoperability and corresponding exception to entering supported system Conditions and Required Actions. The SFDP implements the requirements of LCO 3.0.6.

Cross train checks to identify a loss of safety function for those support systems that support multiple and redundant safety systems are required. The cross train check verifies that the supported systems of the redundant OPERABLE support system are OPERABLE, thereby ensuring safety function is retained. A loss of safety function may exist when a support system is inoperable, and:

- a. A required system redundant to system(s) supported by the inoperable support system is also inoperable (EXAMPLE B 3.0.6-1),
- b. A required system redundant to system(s) in turn supported by the inoperable supported system is also inoperable (EXAMPLE B 3.0.6-2), or
- c. A required system redundant to support system(s) for the supported systems (a) and (b) above is also inoperable (EXAMPLE B 3.0.6-3).

EXAMPLE B 3.0.6-1 ← (Refer to Figure B 3.0-1)

If System 2 of Train A is inoperable and System 5 of Train B is inoperable, a loss of safety function exists in supported System 5, 10, and 11.

EXAMPLE B 3.0.6-2 ← (Refer to Figure B 3.0-1)

If System 2 of Train A is inoperable, and System 11 of Train B is inoperable, a loss of safety function exists in System 11 which is in turn supported by System 5.

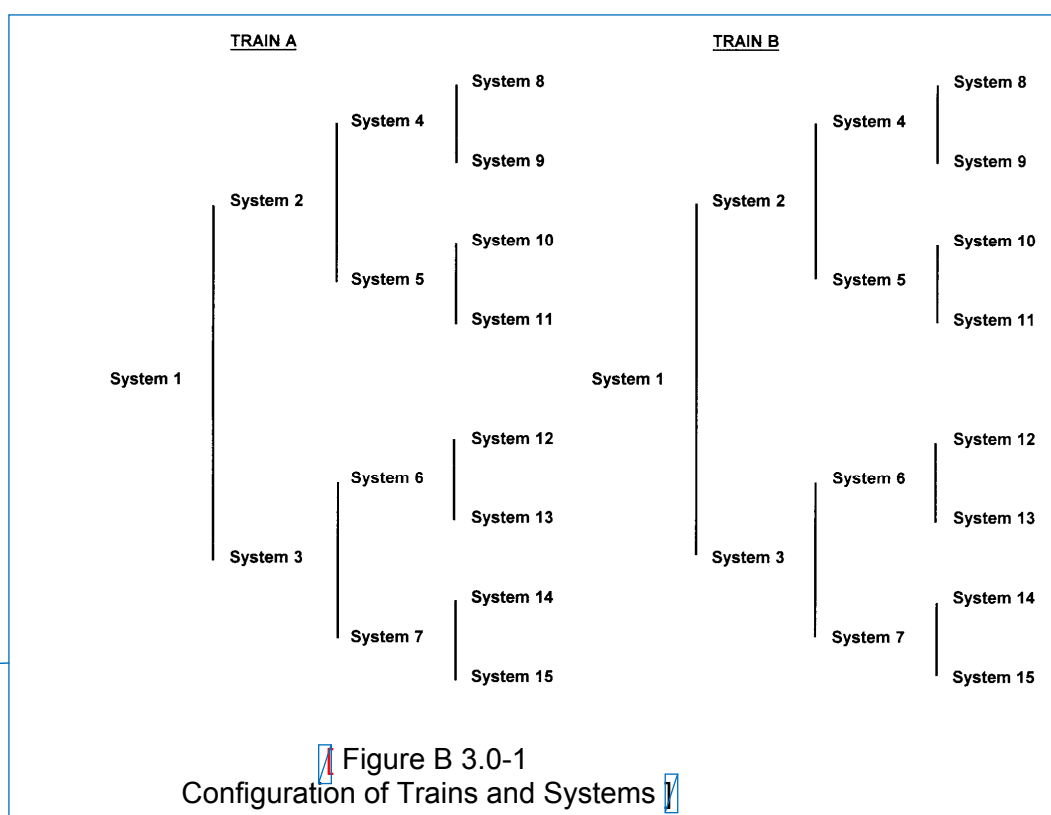
BASES

LCO 3.0.6 (continued)

EXAMPLE B 3.0.6-3 ← (Refer to Figure B 3.0-1)

If System 2 of Train A is inoperable, and System 1 of Train B is inoperable, a loss of safety function exists in Systems 2, 4, 5, 8, 9, 10 and 11.

If this evaluation determines that a loss of safety function exists, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.



This loss of safety function does not require the assumption of additional single failures or loss of offsite power. Since operations are being restricted in accordance with the ACTIONS of the support system, any resulting temporary loss of redundancy or single failure protection is taken into account. Similarly, the ACTIONS for inoperable offsite circuit(s) and inoperable diesel generator(s) provide the necessary restriction for cross train inoperabilities. This explicit cross train verification for inoperable AC electrical power sources also acknowledges that supported system(s) are not declared inoperable solely as a result of inoperability of a normal or emergency electrical power source (refer to the definition of OPERABILITY).

## BASES

## LCO 3.0.6 (continued)

When loss of safety function is determined to exist, and the SFDP requires entry into the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists, consideration must be given to the specific type of function affected. Where a loss of function is solely due to a single Technical Specification support system (e.g., loss of automatic start due to inoperable instrumentation, or loss of pump suction source due to low tank level) the appropriate LCO is the LCO for the support system. The ACTIONS for a support system LCO adequately address the inoperabilities of that system without reliance on entering its supported system LCO. When the loss of function is the result of multiple support systems, the appropriate LCO is the LCO for the supported system.

## LCO 3.0.7

Special tests and operations are required at various times over the unit's life to demonstrate performance characteristics, to perform maintenance activities, and to perform special evaluations. Because TS normally preclude these tests and operations, special test exceptions (STEs) allow specified requirements to be changed or suspended under controlled conditions. STEs are included in applicable sections of the Specifications. Unless otherwise specified, all other TS requirements remain unchanged and in effect as applicable. This will ensure that all appropriate requirements of the MODE or other specified condition not directly associated with or required to be changed or suspended to perform the special test or operation will remain in effect.

The Applicability of an STE LCO represents a condition not necessarily in compliance with the normal requirements of the TS. Compliance with STE LCOs is optional.

A special test may be performed under either the provisions of the appropriate STE LCO or the other applicable TS requirements. If it is desired to perform the special test under the provisions of the STE LCO, the requirements of the STE LCO shall be followed. This includes the SRs specified in the STE LCO.

Some of the STE LCOs require that one or more of the LCOs for normal operation be met (i.e., meeting the STE LCO requires meeting the specified normal LCOs). The Applicability, ACTIONS, and SRs of the specified normal LCOs, however, are not required to be met in order to meet the STE LCO when it is in effect. This means that, upon failure to meet a specified normal LCO, the associated ACTIONS of the STE LCO

## BASES

## LCO 3.0.7 (continued)

apply, in lieu of the ACTIONS of the normal LCO. Exceptions to the above do exist. There are instances when the Applicability of the specified normal LCO must be met, where its ACTIONS must be taken, where certain of its Surveillances must be performed, or where all of these requirements must be met concurrently with the requirements of the STE LCO.

Unless the SRs of the specified normal LCOs are suspended or changed by the special test, those SRs that are necessary to meet the specified normal LCOs must be met prior to performing the special test. During the conduct of the special test, those Surveillances need not be performed unless specified by the ACTIONS or SRs of the STE LCO.

ACTIONS for STE LCOs provide appropriate remedial measures upon failure to meet the STE LCO. Upon failure to meet these ACTIONS, suspend the performance of the special test and enter the ACTIONS for all LCOs that are then not met. Entry into LCO 3.0.3 may possibly be required, but this determination should not be made by considering only the failure to meet the ACTIONS of the STE LCO.

## LCO 3.0.8

LCO 3.0.8 establishes conditions under which systems are considered to remain capable of performing their intended safety function when associated snubbers are not capable of providing their associated support function(s). This LCO states that the supported system is not considered to be inoperable solely due to one or more snubbers not capable of performing their associated support function(s). This is appropriate because a limited length of time is allowed for maintenance, testing, or repair of one or more snubbers not capable of performing their associated support function(s) and appropriate compensatory measures are specified in the snubber requirements, which are located outside of the Technical Specifications (TS) under licensee control. The snubber requirements do not meet the criteria in 10 CFR 50.36(c)(2)(ii), and, as such, are appropriate for control by the licensee.

If the allowed time expires and the snubber(s) are unable to perform their associated support function(s), the affected supported system's LCO(s) must be declared not met and the Conditions and Required Actions entered in accordance with LCO 3.0.2.

LCO 3.0.8.a applies when one or more snubbers are not capable of providing their associated support function(s) to a single train or subsystem of a multiple train or subsystem supported system or to a single train or subsystem supported system. LCO 3.0.8.a allows 72 hours to restore the snubber(s) before declaring the supported system

## BASES

## LCO 3.0.8 (continued)

inoperable. The 72 hour Completion Time is reasonable based on the low probability of a seismic event concurrent with an event that would require operation of the supported system occurring while the snubber(s) are not capable of performing their associated support function and due to the availability of the redundant train of the supported system.

LCO 3.0.8.b applies when one or more snubbers are not capable of providing their associated support function(s) to more than one train or subsystem of a multiple train or subsystem supported system. LCO 3.0.8.b allows 12 hours to restore the snubber(s) before declaring the supported system inoperable. The 12 hour Completion Time is reasonable based on the low probability of a seismic event concurrent with an event that would require operation of the supported system occurring while the snubber(s) are not capable of performing their associated support function.

LCO 3.0.8 requires that risk be assessed and managed. Industry and NRC guidance on the implementation of 10 CFR 50.65(a)(4) (the Maintenance Rule) does not address seismic risk. However, use of LCO 3.0.8 should be considered with respect to other plant maintenance activities, and integrated into the existing Maintenance Rule process to the extent possible so that maintenance on any unaffected train or subsystem is properly controlled, and emergent issues are properly addressed. The risk assessment need not be quantified, but may be a qualitative awareness of the vulnerability of systems and components when one or more snubbers are not able to perform their associated support function.

← INSERT Figure B 3.0-1 from Page B 3.0-10

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## B 3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

## BASES

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SRs	SR 3.0.1 through SR 3.0.4 establish the general requirements applicable to all Specifications and apply at all times, unless otherwise stated.
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SR 3.0.1	<p>SR 3.0.1 establishes the requirement that SRs must be met during the MODES or other specified conditions in the Applicability for which the requirements of the LCO apply, unless otherwise specified in the individual SRs. This Specification is to ensure that Surveillances are performed to verify the OPERABILITY of systems and components, and that variables are within specified limits. Failure to meet a Surveillance within the specified Frequency, in accordance with SR 3.0.2, constitutes a failure to meet an LCO. Surveillances may be performed by means of any series of sequential, overlapping, or total steps provided the entire Surveillance is performed within the specified Frequency. Additionally, the definitions related to instrument testing (e.g., CHANNEL CALIBRATION) specify that these tests are performed by means of any series of sequential, overlapping, or total steps.</p>
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Systems and components are assumed to be OPERABLE when the associated SRs have been met. Nothing in this Specification, however, is to be construed as implying that systems or components are OPERABLE when either:

- a. The systems or components are known to be inoperable, although still meeting the SRs or
- b. The requirements of the Surveillance(s) are known to be not met between required Surveillance performances.

Surveillances do not have to be performed when the unit is in a MODE or other specified condition for which the requirements of the associated LCO are not applicable, unless otherwise specified. The SRs associated with a special test exception (STE) are only applicable when the STE is used as an allowable exception to the requirements of a Specification.

Unplanned events may satisfy the requirements (including applicable acceptance criteria) for a given SR. In this case, the unplanned event may be credited as fulfilling the performance of the SR. This allowance includes those SRs whose performance is normally precluded in a given MODE or other specified condition.

Surveillances, including Surveillances invoked by Required Actions, do not have to be performed on inoperable equipment because the ACTIONS define the remedial measures that apply. Surveillances have to be met and performed in accordance with SR 3.0.2, prior to returning equipment to OPERABLE status.

## BASES

## SR 3.0.1 (continued)

Upon completion of maintenance, appropriate post maintenance testing is required to declare equipment OPERABLE. This includes ensuring applicable Surveillances are not failed and their most recent performance is in accordance with SR 3.0.2. Post maintenance testing may not be possible in the current MODE or other specified conditions in the Applicability due to the necessary unit parameters not having been established. In these situations, the equipment may be considered OPERABLE provided testing has been satisfactorily completed to the extent possible and the equipment is not otherwise believed to be incapable of performing its function. This will allow operation to proceed to a MODE or other specified condition where other necessary post maintenance tests can be completed.

Some examples of this process are:

- a. Auxiliary feedwater (AFW) pump turbine maintenance during refueling that requires testing at steam pressures > 800 psi. However, if other appropriate testing is satisfactorily completed, the AFW System can be considered OPERABLE. This allows startup and other necessary testing to proceed until the plant reaches the steam pressure required to perform the testing.
- b. High pressure safety injection (HPSI) maintenance during shutdown that requires system functional tests at a specified pressure. Provided other appropriate testing is satisfactorily completed, startup can proceed with HPSI considered OPERABLE. This allows operation to reach the specified pressure to complete the necessary post maintenance testing.

## SR 3.0.2

SR 3.0.2 establishes the requirements for meeting the specified Frequency for Surveillances and any Required Action with a Completion Time that requires the periodic performance of the Required Action on a "once per..." interval.

SR 3.0.2 permits a 25% extension of the interval specified in the Frequency. This extension facilitates Surveillance scheduling and considers plant operating conditions that may not be suitable for conducting the Surveillance (e.g., transient conditions or other ongoing Surveillance or maintenance activities).

## BASES

## SR 3.0.2 (continued)

The 25% extension does not significantly degrade the reliability that results from performing the Surveillance at its specified Frequency. This is based on the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the SRs. The exceptions to SR 3.0.2 are those Surveillances for which the 25% extension of the interval specified in the Frequency does not apply. These exceptions are stated in the individual Specifications. The requirements of regulations take precedence over the TS. An example of where SR 3.0.2 does not apply is in the Containment Leakage Rate Testing Program. This program establishes testing requirements and Frequencies in accordance with the requirements of regulations. The TS cannot in and of themselves extend a test interval specified in the regulations.

As stated in SR 3.0.2, the 25% extension also does not apply to the initial portion of a periodic Completion Time that requires performance on a "once per ..." basis. The 25% extension applies to each performance after the initial performance. The initial performance of the Required Action, whether it is a particular Surveillance or some other remedial action, is considered a single action with a single Completion Time. One reason for not allowing the 25% extension to this Completion Time is that such an action usually verifies that no loss of function has occurred by checking the status of redundant or diverse components or accomplishes the function of the inoperable equipment in an alternative manner.

The provisions of SR 3.0.2 are not intended to be used repeatedly merely as an operational convenience to extend Surveillance intervals (other than those consistent with refueling intervals) or periodic Completion Time intervals beyond those specified.

## SR 3.0.3

SR 3.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a Surveillance has not been completed within the specified Frequency. A delay period of up to 24 hours or up to the limit of the specified Frequency, whichever is greater, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with SR 3.0.2, and not at the time that the specified Frequency was not met.

This delay period provides adequate time to complete Surveillances that have been missed. This delay period permits the completion of a Surveillance before complying with Required Actions or other remedial measures that might preclude completion of the Surveillance.

## BASES

## SR 3.0.3 (continued)

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillance, and the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements.

When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to entering MODE 1 after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, etc.) is discovered to not have been performed when specified, SR 3.0.3 allows for the full delay period of up to the specified Frequency to perform the Surveillance. However, since there is not a time interval specified, the missed Surveillance should be performed at the first reasonable opportunity.

SR 3.0.3 provides a time limit for, and allowances for the performance of, Surveillances that become applicable as a consequence of MODE changes imposed by Required Actions.

Failure to comply with specified Frequencies for SRs is expected to be an infrequent occurrence. Use of the delay period established by SR 3.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals. While up to 24 hours or the limit of the specified Frequency is provided to perform the missed Surveillance, it is expected that the missed Surveillance will be performed at the first reasonable opportunity. The determination of the first reasonable opportunity should include consideration of the impact on plant risk (from delaying the Surveillance as well as any plant configuration changes required or shutting the plant down to perform the Surveillance) and impact on any analysis assumptions, in addition to unit conditions, planning, availability of personnel, and the time required to perform the Surveillance. This risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance, NRC Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." This Regulatory Guide addresses consideration of temporary and aggregate risk impacts, determination of risk management action thresholds, and risk management action up to and including plant

## BASES

## SR 3.0.3 (continued)

shutdown. The missed Surveillance should be treated as an emergent condition as discussed in the Regulatory Guide. The risk evaluation may use quantitative, qualitative, or blended methods. The degree of depth and rigor of the evaluation should be commensurate with the importance of the component. Missed Surveillances for important components should be analyzed quantitatively. If the results of the risk evaluation determine the risk increase is significant, this evaluation should be used to determine the safest course of action. All missed Surveillances will be placed in the licensee's Corrective Action Program.

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon the failure of the Surveillance.

Completion of the Surveillance within the delay period allowed by this Specification, or within the Completion Time of the ACTIONS, restores compliance with SR 3.0.1.

## SR 3.0.4

SR 3.0.4 establishes the requirement that all applicable SRs must be met before entry into a MODE or other specified condition in the Applicability.

This Specification ensures that system and component OPERABILITY requirements and variable limits are met before entry into MODES or other specified conditions in the Applicability for which these systems and components ensure safe operation of the unit. The provisions of this Specification should not be interpreted as endorsing the failure to exercise the good practice of restoring systems or components to OPERABLE status before entering an associated MODE or other specified condition in the Applicability.

A provision is included to allow entry into a MODE or other specified condition in the Applicability when an LCO is not met due to a Surveillance not being met in accordance with LCO 3.0.4.

## BASES

## SR 3.0.4 (continued)

However, in certain circumstances, failing to meet an SR will not result in SR 3.0.4 restricting a MODE change or other specified condition change. When a system, subsystem, division, component, device, or variable is inoperable or outside its specified limits, the associated SR(s) are not required to be performed, per SR 3.0.1, which states that surveillances do not have to be performed on inoperable equipment. When equipment is inoperable, SR 3.0.4 does not apply to the associated SR(s) since the requirement for the SR(s) to be performed is removed. Therefore, failing to perform the Surveillance(s) within the specified Frequency does not result in an SR 3.0.4 restriction to changing MODES or other specified conditions of the Applicability. However, since the LCO is not met in this instance, LCO 3.0.4 will govern any restrictions that may (or may not) apply to MODE or other specified condition changes. SR 3.0.4 does not restrict changing MODES or other specified conditions of the Applicability when a Surveillance has not been performed within the specified Frequency, provided the requirement to declare the LCO not met has been delayed in accordance with SR 3.0.3.

The provisions of SR 3.0.4 shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. In addition, the provisions of SR 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown. In this context, a unit shutdown is defined as a change in MODE or other specified condition in the Applicability associated with transitioning from MODE 1 to MODE 2, MODE 2 to MODE 3, MODE 3 to MODE 4, and MODE 4 to MODE 5.

The precise requirements for performance of SRs are specified such that exceptions to SR 3.0.4 are not necessary. The specific time frames and conditions necessary for meeting the SRs are specified in the Frequency, in the Surveillance, or both. This allows performance of Surveillances when the prerequisite condition(s) specified in a Surveillance procedure require entry into the MODE or other specified condition in the Applicability of the associated LCO prior to the performance or completion of a Surveillance. A Surveillance that could not be performed until after entering the LCO's Applicability, would have its Frequency specified such that it is not "due" until the specific conditions needed are met. Alternately, the Surveillance may be stated in the form of a Note, as not required (to be met or performed) until a particular event, condition, or time has been reached. Further discussion of the specific formats of SRs' annotation is found in Section 1.4, Frequency.

**JUSTIFICATION FOR DEVIATIONS  
ITS 3.0 BASES, LCO AND SR APPLICABILITY**

1. Changes are made (additions, deletions, and/or changes) to the ISTS Bases which reflect the plant specific nomenclature, number, reference, system description, analysis, or licensing basis description.
2. These Changes are made to the ISTS Bases which reflect grammatical changes or any changes in conjunction with the Writers Guide for the Improved Standard Technical Specifications, TSTF-GG-05-01. These changes include use of periods, commas, semi-colons, lines not in conjunction with the writers guide, etc.
3. The ISTS contains bracketed information and/or values that are generic to all Combustion Engineering vintage plants. The brackets are removed and the proper plant specific information/value is provided. This is acceptable since the information/value is changed to reflect the current licensing basis.
4. ISTS Figure 3.0-1 is being moved to the end of the Section, consistent with the format of the ISTS (Figures appear at the end of a Specification). Also, due to this movement, the Examples have been clarified to refer to the Figure.
5. The Specification number has been changed to be consistent with changes made to the applicable Specifications in other Sections.
6. The following fixes to incorrect statements for the examples in the LCO 3.0.6 Bases have been made. Specifically:
  - 1) Example B 3.0.6-1 is changed from "If System 2 of Train A is inoperable and System 5 of Train B is inoperable, a loss of safety function exists in supported System 5" to "If System 2 of Train A is inoperable and System 5 of Train B is inoperable, a loss of safety function exists in Systems 5, 10, and 11." Examining Figure B 3.0-1, it is clear that if there is a loss of safety function in System 5, there is also a loss of safety function in the systems supported by System 5, i.e., Systems 10 and 11. This relationship is explicitly listed in Example B 3.0.6-3 and to not do so here is inconsistent and confusing as it leads the reader to believe that Systems 10 and 11 do not have a loss of safety function. Furthermore, System 5 of Train B is not a supported System of System 2 of Train A, since they are in different trains. Thus, the word "supported" has been deleted.
  - 2) Example B 3.0.6-2 is changed from "If System 2 of Train A is inoperable, and System 11 of Train B is inoperable, a loss of safety function exists in System 11 which is in turn supported by System 5" to "If System 2 of Train A is inoperable, and System 11 of Train B is inoperable, a loss of safety function exists in System 11." The phrase "which in turn is supported by System 5" is confusing. System 5 is not inoperable and does not lead to the loss of safety function. Examples B 3.0.6-1 and B 3.0.6-3 do not discuss OPERABLE support systems. This phrase adds no value and leads the reader to believe there is some special relationship with System 5 which does not exist.

Southern California Edison (SCE) needs to make these changes since the current wording in the ISTS 3.0.6 Bases are not correct. Furthermore, these changes are consistent with industry approved TSTF-494T.

**Specific No Significant Hazards Considerations (NSHCs)**



**DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS  
ITS 3.0, LCO AND SR APPLICABILITY**

10 CFR 50.92 EVALUATION  
FOR  
LESS RESTRICTIVE CHANGE L01

Southern California Edison (SCE) is updating the San Onofre Nuclear Generating Station (SONGS) Technical Specifications to the Improved Technical Specifications (ITS) as outlined in NUREG-1432, Rev. 3.0, "Standard Technical Specifications, Combustion Engineering Plants" and additional approved Technical Specification Task Force (TSTF) travelers included in this submittal. The proposed change involves making the Current Technical Specifications (CTS) less restrictive. Below is the description of this less restrictive change and the determination of No Significant Hazards Considerations for conversion to NUREG-1432, Rev. 3.0.

CTS Section 3.0 does not contain an allowance when snubbers cannot perform their support function. ITS Section 3.0 contains this allowance as Limiting Condition for Operation (LCO) 3.0.8. This proposed change to CTS 3.0, "LCO Applicability" adds a new LCO 3.0.8 consistent with TSTF-372. Due to this addition, an allowance is also needed in LCO 3.0.1 and has been added.

The relocation of snubbers to a licensee controlled document has resulted in non-uniform and inconsistent treatment of snubbers. The proposed LCO 3.0.8 corrects the unintended consequence that resulted from the relocation of the snubbers and restores the level of plant safety afforded by the snubbers prior to their relocation. Some potential undesirable consequences of this inconsistent treatment of snubbers are:

- Performance of testing during crowded windows when the supported system is inoperable with the potential to reduce the snubber testing to a minimum since the relocated snubber requirements are controlled by the licensee;
- Performance of testing during crowded windows when the supported system is inoperable with the potential to increase the unavailability of safety systems; and
- Performance of testing and maintenance on snubbers affecting multiple trains of the same supported system during the 7 hours allotted before entering MODE 3 under LCO 3.0.3.

To remove the inconsistency in the treatment of snubbers, a delay time is provided before entering the actions for the supported equipment when one or more snubbers are found inoperable or removed for testing. Such a delay time will provide needed flexibility in the performance of maintenance and testing during power operation and at the same time will enhance overall plant safety by (1) avoiding unnecessary unscheduled plant shutdowns, thus, minimizing plant transition and realignment risks; (2) avoiding reduced snubber testing, thus increasing the availability of snubbers to perform their supporting function; (3) performing most of the required testing and maintenance during the delay time when the supported system is available to mitigate most challenges, thus avoiding increases in safety system unavailability; and (4) providing explicit risk-informed guidance in areas in which that guidance currently does not exist, such as the treatment of snubbers impacting more than one redundant train of a supported system.

**DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS  
ITS 3.0, LCO AND SR APPLICABILITY**

SCE has verified that it is encompassed by the risk informed evaluation performed in the NRC Safety Evaluation for TSTF-372. Consistent with the staff's approval and inherent in the implementation of TSTF-372, SCE will operate SONGS Unit 2 and 3 in accordance with the following stipulations:

1. Appropriate plant procedures and administrative controls will be used to implement the following Tier 2 Restrictions.
  - (a) At least one AFW train (including a minimum set of supporting equipment required for its successful operation) not associated with the inoperable snubber(s), or some alternative means of core cooling (e.g., feed and bleed (F&B), fire water system or "aggressive secondary cooldown" using the steam generators) must be available when LCO 3.0.8b is used.
  - (b) LCO 3.0.8b cannot be used with no F&B capability when a snubber, whose non-functionality would disable more than one train of AFW in a seismic event of magnitude up to the plant's SSE, is inoperable.
  - (c) Every time the provisions of LCO 3.0.8 are used licensees will be required to confirm that at least one train (or subsystem) of systems supported by the inoperable snubbers would remain capable of performing their required safety or support functions for postulated design loads other than seismic loads. LCO 3.0.8 does not apply to non-seismic snubbers. In addition, a record of the design function of the inoperable snubber (i.e., seismic vs. non-seismic), implementation of any applicable Tier 2 restrictions, and the associated plant configuration shall be available on a recoverable basis for staff inspection.
  
2. Should SCE implement the provisions of LCO 3.0.8 for snubbers, which include delay times to enter the actions for the supported equipment when one or more snubbers are out of service for maintenance or testing, it must be done in accordance with an overall configuration risk management program (CRMP) to ensure that potentially risk-significant configurations resulting from maintenance and other operational activities are identified and avoided, as discussed in the proposed Technical Specification (TS) Bases. This objective is met by SONGS programs to comply with the requirements of paragraph (a)(4) of the Maintenance Rule, 10 CFR 50.65, to assess and manage risk resulting from maintenance activities or when this process is invoked by LCO 3.0.8 or other TS. These programs will support licensee decision making regarding the appropriate actions to manage risk whenever a risk-informed TS is entered. Since the 10 CFR 50.65(a)(4) guidance, the revised (May 2000) Section 11 of NUMARC 93-01, does not currently address seismic risk, when adopting this change SCE will ensure that the proposed LCO 3.0.8 is considered in conjunction with other plant maintenance activities and integrated into the existing 10 CFR 50.65(a)(4) process. In the absence of a detailed seismic PRA, a bounding risk assessment, as utilized in the NRC Safety Evaluation, will be followed.

**DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS  
ITS 3.0, LCO AND SR APPLICABILITY**

An evaluation has been performed to determine whether or not a significant hazards consideration is involved with these proposed Technical Specification changes by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

**1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?**

Response: No.

The proposed change allows a delay time before declaring supported TS systems inoperable when the associated snubber(s) cannot perform its required safety function. Entrance into Actions or delaying entrance into Actions is not an initiator of any accident previously evaluated. Therefore, the probability of an accident previously evaluated is not significantly increased. The consequences of an accident while relying on the delay time allowed before declaring a TS supported system inoperable and taking its Conditions and Required Actions are no different than the consequences of an accident under the same plant conditions while relying on the existing TS supported system Conditions and Required Actions. Therefore, the consequences of an accident previously evaluated are not significantly increased by this change. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

**2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?**

Response: No.

The proposed change allows a delay time before declaring supported TS systems inoperable when the associated snubber(s) cannot perform its required safety function. The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or a change in the methods governing normal plant operation. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

**3. Does the proposed change involve a significant reduction in a margin of safety?**

Response: No.

The proposed change allows a delay time before declaring supported TS systems inoperable when the associated snubber(s) cannot perform its required safety function. The proposed change restores an allowance in the pre-ISTS conversion TS that was unintentionally eliminated by the conversion. The pre-ISTS TS were considered to provide an adequate margin of safety for plant operation, as does the post-ISTS conversion TS. Therefore, this change does not involve a significant reduction in a margin of safety.

Based on the above, SCE concludes that the proposed change presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

**DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS  
ITS 3.0, LCO AND SR APPLICABILITY**

10 CFR 50.92 EVALUATION  
FOR  
LESS RESTRICTIVE CHANGE L02

Southern California Edison (SCE) is updating the San Onofre Nuclear Generating Station (SONGS) Technical Specifications to the Improved Technical Specifications (ITS) as outlined in NUREG-1432, Rev. 3.0, "Standard Technical Specifications, Combustion Engineering Plants" and additional approved Technical Specification Task Force (TSTF) travelers included in this submittal. The proposed change involves making the Current Technical Specifications (CTS) less restrictive. Below is the description of this less restrictive change and the determination of No Significant Hazards Considerations for conversion to NUREG-1432, Rev. 3.0.

CTS LCO 3.0.4 states:

"When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall not be made except when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time."

Also included in CTS LCO 3.0.4 is the following discussion of exceptions to this specification:

"Exceptions to this Specification are stated in the individual Specifications. These exceptions allow entry into MODES or other specific conditions in the Applicability when the associated ACTIONS to be entered allow unit operation in the MODE or other specified condition in the Applicability only for a limited period of time."

The allowance to enter MODES or specified conditions in the Applicability while relying on ACTIONS is given because ACTIONS which permit continued operation of the unit for an unlimited period provide an acceptable level of safety for continued operation. This is without regard to the status of the unit before or after the MODE change.

CTS Surveillance Requirement (SR) 3.0.4 allows entry into MODES and other conditions only when the SRs have been met except when required to comply with Actions.

ITS LCO 3.0.4 states:

"When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall only be made (a) When the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time; (b) After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate; exceptions to this Specification are stated in the individual Specifications, or (c) When an allowance is stated in the individual value, parameter, or other Specification."

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The CTS does not include the exceptions to the specification that are in the ITS. The proposed change revises LCO 3.0.4 and SR 3.0.4.

ITS SR 3.0.4 is consistent with the CTS SR 3.0.4; however, the following exception is being added, "...except as provided by SR 3.0.3. When an LCO is not met due to Surveillances not having been met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with LCO 3.0.4"

This changes the CTS by providing allowances for entry into a MODE or other specified condition in the Applicability when an LCO is not met.

The purpose of LCO 3.0.4 is to provide guidance when an LCO is not met and entry into a MODE or other specified condition in the Applicability is desired. SCE has reviewed the safety evaluation dated March 28, 2003, which was published in the Federal Register to support this change through the Consolidated Line Item Improvement Process. This review included a review of the NRC staff's evaluation, as well as the supporting information provided to support TSTF-359, rev. 8. SCE has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to SCE and justify the incorporation of this change into the San Onofre Units 2 and 3 Technical Specifications. Therefore, the change is considered acceptable.

In addition, the proposed Bases for LCO 3.0.4 and SR 3.0.4 are consistent with that provided in the TSTF, except for minor editorial changes that do not change the intent of the TSTF Bases. The proposed Bases provides details on how to implement the new requirement. Specifically, LCO 3.0.4 establishes limitations on changes in MODES or other specified conditions in the Applicability when an LCO is not met. It allows placing the unit in a MODE or other specified condition stated in that Applicability (e.g., the Applicability desired to be entered) when unit conditions are such that the requirements of the LCO would not be met, in accordance with LCO 3.0.4.a, LCO 3.0.4.b, or LCO 3.0.4.c.

LCO 3.0.4.a allows entry into a MODE or other specified condition in the Applicability with the LCO not met when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time. Compliance with Required Actions that permit continued operation of the unit for an unlimited period of time in a MODE or other specified condition provides an acceptable level of safety for continued operation. This is without regard to the status of the unit before or after the MODE change.

LCO 3.0.4.b allows entry into a MODE or other specified condition in the Applicability with the LCO not met after performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate. The risk assessment may use quantitative, qualitative, or blended approaches, and the risk assessment will be conducted using the plant program, procedures, and criteria in place to implement 10 CFR 50.65(a)(4), which requires that risk impacts of maintenance activities to be assessed and managed. The risk assessment, for the purposes of LCO 3.0.4.b, must take into account all inoperable Technical Specification equipment regardless of whether the equipment is included in the normal 10 CFR 50.65(a)(4) risk assessment scope.

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The risk assessments will be conducted using the procedures and guidance endorsed by Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." Regulatory Guide 1.182 endorses the guidance in Section 11 of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." These documents address general guidance for conduct of the risk assessment, quantitative and qualitative guidelines for establishing risk management actions, and example risk management actions. These include actions to plan and conduct other activities in a manner that controls overall risk, increased risk awareness by shift and management personnel, actions to reduce the duration of the condition, actions to minimize the magnitude of risk increases (establishment of backup success paths or compensatory measures), and determination that the proposed MODE change is acceptable. Consideration should also be given to the probability of completing restoration such that the requirements of the LCO would be met prior to the expiration of ACTIONS Completion Times that would require exiting the Applicability.

LCO 3.0.4.b may be used with single, or multiple systems and components unavailable. NUMARC 93-01 provides guidance relative to consideration of simultaneous unavailability of multiple systems and components. The results of the risk assessment shall be considered in determining the acceptability of entering the MODE or other specified condition in the Applicability, and any corresponding risk management actions. The LCO 3.0.4.b risk assessments do not have to be documented. The Technical Specifications allow continued operation with equipment unavailable in MODE 1 for the duration of the Completion Time. Since this is allowable, and since in general the risk impact in that particular MODE bounds the risk of transitioning into and through the applicable MODES or other specified conditions in the Applicability of the LCO, the use of the LCO 3.0.4.b allowance should be generally acceptable, as long as the risk is assessed and managed as stated above.

There is a small subset of systems and components that have been determined to be more important to risk and use of the LCO 3.0.4.b allowance is prohibited. The LCOs governing these systems and components contain Notes prohibiting the use of LCO 3.0.4.b by stating that LCO 3.0.4.b is not applicable. LCO 3.0.4.c allows entry into a MODE or other specified condition in the Applicability with the LCO not met based on a Note in the Specification which states LCO 3.0.4.c is applicable. These specific allowances permit entry into MODES or other specified conditions in the Applicability when the associated ACTIONS to be entered do not provide for continued operation for an unlimited period of time and a risk assessment has not been performed. This allowance may apply to all the ACTIONS or to a specific Required Action of a Specification.

The risk assessments performed to justify the use of LCO 3.0.4.b usually only consider systems and components. For this reason, LCO 3.0.4.c is typically applied to Specifications that describe values and parameters. The provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. In addition, the provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown. In this context, a unit shutdown is defined as a change in MODE or other specified condition in the Applicability associated with transitioning from MODE 1 to MODE 2, MODE 2 to MODE 3, and MODE 3 to MODE 4. Upon entry into a

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MODE or other specified condition in the Applicability with the LCO not met, LCO 3.0.1 and LCO 3.0.2 require entry into the applicable Conditions and Required Actions until the Condition is resolved, until the LCO is met, or until the unit is not within the Applicability of the Technical Specifications. Surveillances do not have to be performed on the associated inoperable equipment (or on variables outside the specified limits), as permitted by SR 3.0.1.

Therefore, utilizing LCO 3.0.4 is not a violation of SR 3.0.1 or SR 3.0.4 for Surveillances that have not been performed on inoperable equipment. However, SRs must be met to ensure OPERABILITY prior to declaring the associated equipment OPERABLE (or variable within limits) and restoring compliance with the affected LCO. This change is designated as less restrictive because entry into MODES or other specified conditions in the Applicability of a Specification might be made with an LCO not met as long as the plant is in compliance with LCO 3.0.4.

An evaluation has been performed to determine whether or not a significant hazards consideration is involved with these proposed Technical Specification changes by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

**1. Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?**

Response: No.

The proposed change allows entry into a MODE while relying on ACTIONS. Being in an ACTION is not an initiator of any accident previously evaluated. Consequently, the probability of an accident previously evaluated is not significantly increased. The consequences of an accident while relying on ACTIONS as allowed by the proposed LCO 3.0.4 are no different than the consequences of an accident while relying on ACTIONS for other reasons, such as equipment inoperability. Therefore, the consequences of an accident previously evaluated are not significantly increased by this change. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

**2. Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?**

Response: No.

The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed). Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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**3. Does this change involve a significant reduction in a margin of safety?**

Response: No.

The proposed change allows entry into a MODE or other specified conditions in the Applicability while relying on ACTIONS. The Technical Specifications allow operation of the plant without a full complement of equipment. The risk associated with this allowance is managed by the imposition of ACTIONS and Completion Times. The net effect of ACTIONS and Completion Times on the margin of safety is not considered significant. The proposed change does not change the ACTIONS or Completion Times of the Technical Specifications. The proposed change allows the ACTIONS and Completion Times to be used in new circumstances. However, this use is predicated on an assessment which focuses on managing plant risk. In addition, most current allowances to utilize the ACTIONS and Completion Times which do not require risk assessment are eliminated. As a result, the net change to the margin of safety is insignificant. Therefore, this change does not involve a significant reduction in a margin of safety.

Based on the above, SCE concludes that the proposed change presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.